

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: TBD

Region: Mooresville Regional Office
County: Gaston
NC Facility ID: 3600039
Inspector's Name: Jim Hafner
Date of Last Inspection: 08/22/2017
Compliance Code: 3 / Compliance - inspection

Facility Data Applicant (Facility's Name): Duke Energy Carolinas, LLC - Allen Steam Station Facility Address: Duke Energy Carolinas, LLC - Allen Steam Station 253 Plant Allen Road Belmont, NC 28012 SIC: 4911 / Electric Services NAICS: 221112 / Fossil Fuel Electric Power Generation Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V				Permit Applicability (this application only) SIP: 02D: .0501, .0503, .0510, .0516, .0519, .0521, .0524, .0535, .0536, .0540, .0606, .0614, .1100, 1109, .1111, 1417 02Q: .0317, .0400 NSPS: Dc, OOO, IIII, JJJJ NESHAP: ZZZZ, UUUUU, Case-by-Case PSD: n/a PSD Avoidance: PM10 NC Toxics: 02D .1100 112(r): n/a Other: CSAPR, Acid Rain Removed: 02D .2400, 02D .2500, 02Q .0309			
Contact Data				Application Data Application Number: 3600039.14A, .15C, .16A Date Received: 02/17/2014 (.14A), 06/26/2015 (.15A), 02/01/2016 (.16A) Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 03757/T43 Existing Permit Issue Date: 09/15/2017 Existing Permit Expiration Date: 12/31/2019			
Facility Contact M. Randy Gantt Lead EHS Professional (704) 829-2587 253 Plant Allen Road Belmont, NC 28012	Authorized Contact P. Brent Dueitt General Manager II (704) 829-2400 253 Plant Allen Road Belmont, NC 28012	Technical Contact Ann Quillian Lead Environmental Specialist (919) 546-6610 PO Box 1551 Raleigh, NC 27602					
Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2015	1127.94	2682.31	21.27	353.68	178.19	20.96	17.92 [Hydrogen chloride (hydrochlori)]
2014	1718.20	4018.53	29.88	984.77	291.49	28.98	24.87 [Hydrogen chloride (hydrochlori)]
2013	846.27	3155.95	25.31	884.92	322.22	29.05	23.95 [Hydrogen chloride (hydrochlori)]
2012	707.34	2296.93	25.18	864.71	242.38	33.19	27.49 [Hydrogen chloride (hydrochlori)]
2011	1665.32	4401.64	53.38	1804.34	534.51	71.32	59.09 [Hydrogen chloride (hydrochlori)]
Review Engineer: Russell Braswell Review Engineer's Signature: _____ Date: _____					Comments / Recommendations: Issue 03757/T44 Permit Issue Date: TBD Permit Expiration Date: TBD		

1. Purpose of Application:

- .14A

Duke Energy Carolinas, LLC - Allen Steam Station (Duke - Allen) currently operates a coal-fired power plant under Title V Air Quality permit 03757T43, which is currently set to expire on December 31, 2019. Duke – Allen submitted this permit application in order to renew the Title V permit. Because this renewal application was received at least nine months before the expiration date, the existing permit will remain in effect until this renewal application is processed.

- .15C

Duke – Allen holds a Title IV Acid Rain Permit. This permit is incorporated into the Title V permit. Duke – Allen submitted this permit application in order to renew the Title IV permit. The effective dates of the Title V and Title IV permits will be synchronized.

- .16A

Duke – Allen submitted this permit application in order to change limits associated with the Acid Rain Permit.

2. Facility Description:

According to the most recent inspection report (Jim Hafner, August 22, 2017), this facility is an electric generating utility primarily fired with coal and has a gross output capacity of 1,285 megawatts.

3. History/Background Since the Previous Permit Renewal:

- January 22, 2010 Permit T34 issued. This action renewed the Title V and Acid Rain permits and incorporated facility-wide arsenic emission limits.
- December 20, 2010 Permit T35 issued. This was an administrative amendment to correct some permit conditions added in the T34 permit.
- February 7, 2011 Permit T36 issued. This was a TV-Significant modification that incorporated the Case-by-Case MACT for boilers into the permit.
- October 6, 2011 Permit T37 issued. This was a TV-Significant modification that allowed testing of calcium bromide and "alkaline-based" additives for mercury control.
- July 17, 2013 Permit T38 issued. This was a TV-Significant modification that allowed testing for activated carbon additives for mercury control.
- April 7, 2014 Permit T39 issued. This was a TV-Minor modification that permanently added "alkaline-based" additives to the permit.
- January 13, 2015 Permit T40 issued. This was a TV-Significant modification that updated the Acid Rain permit, revised some of the TAP emission limits, and extended testing of calcium bromide additives. In addition, the permit expiration date was extended while DAQ processed the permit renewal application.

- March 27, 2017 Permit T41 issued. This was a TV-Significant modification that allowed the use of PM CEMS for opacity monitoring, added a full permit condition for MACT Subpart UUUUU, and permanently added calcium bromide additives (referred to now as "halide salts") to the permit.
- August 9, 2017 Permit T42 issued. This was a TV-Minor modification that changed the operation and maintenance requirements for the PM CEMS.
- September 15, 2017 Permit T43 issued. This was a TV-Major modification that removed all references to halide salts from the permit. In addition, it disallowed the use of bromine-containing materials for mercury control.

4. Application Chronology:

- February 17, 2014 Application .14A received.
- June 26, 2015 Application .15C received.
- February 1, 2016 Application .16A received.
- August 14, 2017 Applications transferred to Russell Braswell.
- August 31, 2017 Email from Ann Quillian requesting that ammonia injection be removed from the permit.
- September 6, 2017 Email sent to Ann Quillian regarding potential updates to the permit. She responded by email on September 11, 2017.
- September 29, 2017 An initial draft of the permit and review were sent to DAQ staff (Mark Cuilla, Tom Anderson, Samir Parekh, Jim Hafner) and Duke – Allen staff (Ann Quillian). For a summary of comments received, see Attachment 2.
- October 30, 2017 Email sent to Ann Quillian regarding potential changes to the Insignificant Activities list. She responded by email on October 31, 2017.
- XXXXX Public / EPA notice
- XXXXX Permit issued.

5. Permit Modifications/Changes and TVEE Discussion:

- Ammonia injection has been removed from the permit at the facility's request.
- Updated equations throughout the permit to be clearer.
- Removed references to rules that have been repealed or expired.
- Added a permit condition for CSAPR.
- Moved all emergency-use engines (except ES-7) to the Insignificant Activities list.

The complete list of changes to the permit can be found in Attachment 1.

6. Regulatory Overview:

Duke - Allen is subject to the following State Implementation Plan (SIP) and Federal regulations, in addition to the requirements in the General Conditions:

- 15A NCAC 02D .0501 "Compliance with National Ambient Air Quality Standards"
- 15A NCAC 02D .0503 "Particulates from Fuel Burning Indirect Heat Exchangers"
- 15A NCAC 02D .0510 "Particulates from Sand, Gravel, or Crushed Stone Operations"
- 15A NCAC 02D .0516 "Sulfur Dioxide from Combustion Sources"
- 15A NCAC 02D .0519 "Control of Nitrogen Dioxide and Nitrogen Oxides Emissions"
- 15A NCAC 02D .0521 "Control of Visible Emissions"
- 15A NCAC 02D .0524 "New Source Performance Standards"
(40 CFR Part 60, Subparts Dc, OOO, IIII, JJJJ)
- 15A NCAC 02D .0535 "Excess Emissions Reporting and Malfunctions"
- 15A NCAC 02D .0536 "Particulate Emissions from Electric Utility Boilers"
- 15A NCAC 02D .0540 "Particulates from Fugitive Dust Emission"
- 15A NCAC 02D .0606 "Sources Covered by Appendix P of 40 CFR Part 51"
- 15A NCAC 02D .0614 "Compliance Assurance Monitoring"
- 15A NCAC 02D .1100 "Control of Toxic Air Pollutants"
- 15A NCAC 02D .1109 "112(j) Case-by-Case Maximum Achievable Control Technology"
- 15A NCAC 02D .1111 "Maximum Achievable Control Technology"
(40 CFR Part 63, Subparts ZZZZ, UUUUU)
- 15A NCAC 02D .1417 "Boilers and Indirect-Fired Process Heaters"
- 15A NCAC 02Q .0317 "Avoidance Conditions"
(PSD Avoidance)
- 15A NCAC 02Q .0400 "Acid Rain Procedures"
- Cross State Air Pollution Rule (aka CSAPR)
(40 CFR Part 97, Subparts AAAAA, BBBB, and CCCCC)

An extensive review for the regulations under Sections 02D and 02Q is not included in this document because the facility's status with respect to these regulations has not changed. The permit will be updated to reflect the most current stipulations for all applicable regulations.

For a review of permit changes and an explanation of rules included in the permit, see Section 7, below.

7. Rules Review

a. New Source Performance Standards (NSPS, 40 CFR Part 60)

1. *Subparts D "Fossil-Fuel-Fired Steam Generators" and Da "Electric Utility Steam Generating Units"*

These rules apply to boilers that produce steam for electricity generation and were constructed and/or modified after the applicability date. The applicability date of Subpart D is August 17, 1971, and for Subpart Da is September 18, 1978.

The electricity-generating boilers at this facility were constructed before the applicability date of both of these rules, and have not undergone changes that would classify them as "new" or "reconstructed" under these rules.

Therefore, neither of these rules apply to this facility.

2. *Subpart Dc "Small Industrial-Commercial-Institutional Steam Generating Units"*

This rule applies to boilers constructed after 1989 and that have a capacity between 10 and 100 million Btu per hour (MMBtu/hr). The only such boiler at this facility is ES-6.

For boilers of this size, the only requirements under this rule is to burn low sulfur fuel and to keep records of fuel burned.

During the most recent inspection, Duke – Allen appeared to be in compliance with this rule. Continued compliance will be determined during subsequent inspections.

3. *Subpart OOO "Nonmetallic Mineral Processing Plants"*

This rule applies to facilities that process nonmetallic minerals, have a grinder on site, and were constructed after 1983. All of the limestone handling sources at this facility are subject to this rule.

This rule limits particulate and visible emissions from sources based on the type of source, if the emissions are fugitive, and if the sources are enclosed in a building.

The rule required an initial compliance demonstration, and Duke completed it in 2009. In order to demonstrate continued compliance, the facility must perform regular maintenance on control devices and regular checks for visible emissions.

During the most recent inspection, Duke – Allen appeared to be in compliance with this rule. Continued compliance will be determined during subsequent inspections.

4. *Subpart IIII "Stationary Compression Ignition Internal Combustion Engines"*

This rule applies to stationary CI engines installed after July 11, 2005. Of all of the CI engines at this facility, only ES-7 is not subject to this rule.

Each subject engine at this facility is considered "emergency use". In general, the requirements for such engines are:

- Operate an engine certified to the emission standards in the rule,
- Burn low-sulfur diesel,
- Install a non-resettable hour meter,
- Operate according to the manufacturer's instructions,
- Only operate the engine during periods of emergency or maintenance

This rule applies only to emission sources on the Insignificant Activities list. Therefore, the permit will not contain a specific condition for this rule.

During the most recent inspection, Duke – Allen appeared to be in compliance with this rule. Continued compliance will be determined during subsequent inspections.

5. *Subpart JJJJ "Stationary Spark Ignition Internal Combustion Engines"*

This rule applies to stationary SI engines based on the size of the engine, usage type of the engine, and installation date. The SI generator for the microwave tower is subject to this rule. This engine is considered emergency-use. In general, the requirements for such engines are:

- Operate an engine certified to the emission standards in the rule,
- Install a non-resettable hour meter,
- Operate according to the manufacturer's instructions,
- Only operate the engine during periods of emergency or maintenance

This rule applies only to emission sources on the Insignificant Activities list. Therefore, the permit will not contain a specific condition for this rule.

During the most recent inspection, Duke – Allen appeared to be in compliance with this rule. Continued compliance will be determined during subsequent inspections.

b. Maximum Available Control Technology (MACT, 40 CFR Part 63)

This facility is a Major Source of hazardous air pollutants (HAPs). Rules that apply exclusively to Area Sources (e.g. Subpart CCCCCC) do not apply to this facility.

1. *Subpart ZZZZ "Stationary Reciprocating Internal Combustion Engines"*

This rule applies to all stationary internal combustion engines.

The requirements of this rule depend on several factors: engine capacity, manufacture date, HAP-Major/Minor, etc. At this facility, the engines fall into two categories: 1) subject to NSPS, or 2) exempt per 40 CFR 63.6590(b)(1)(i).

For engines subject to NSPS, the only requirement under MACT Subpart ZZZZ is to comply with the relevant NSPS. For engines covered by 40 CFR 63.6590(b)(1)(i), there are no requirements that apply under this rule.

2. *Subpart DDDDD "Major Sources: Industrial/Commercial/Institutional Boilers and Process Heaters"*

This rule applies to boilers located at HAP-Major sources. Note that boilers subject to MACT Subpart UUUUU are not subject to this rule. Therefore, the only source at this facility potentially subject to this rule is the auxiliary boiler ES-6. Under this rule, ES-6 is considered an existing liquid-fired boiler with no control devices.

Due to legal challenges to this rule, NC DAQ implemented the Case-by-Case MACT (CBCM) for boilers and process heaters. Currently, ES-6 is subject to that rule. Based on the new promulgation date of MACT Subpart DDDDD, Duke – Allen will begin complying with the MACT on May 20, 2019.

In 2016, a court remanded portions of this rule back to EPA for revisions. Therefore, some of the requirements of this rule may change. As the rule currently stands, the general requirements for this boiler are:

- Conduct an initial energy assessment,

- Conduct an initial and annual tune-up,
- Comply with emission limits in Table 2 to the rule, and
- Conduct initial testing (and subsequent testing if burning non-ultra-low sulfur fuel)

A permit condition for this rule has been added to the permit. The Permittee will not have to comply with this condition until May 20, 2019. Compliance with this rule will be determined at that time.

3. *Subpart UUUUU "Coal- and Oil-Fired Electric Utility Steam Generating Units"*

This rule applies to all coal/oil-fired boilers that generate steam used to produce electricity. Each of the coal-fired boilers at this facility is subject to this rule. This rule is often referred to as "Mercury Air Toxics Standards", "MATS", or the "EGU MACT".

The rule has several optional limits:

- 1) A limit for PM, or a limit for total metal HAP, or a limit for several individual HAP; and
- 2) A limit for HCl or SO₂; and
- 3) A limit for mercury.

In order to demonstrate compliance with the limits, Duke – Allen operates a CEMS for PM, SO₂, and mercury. The rule also requires good work practices, periodic tune-ups, and semiannual reports.

During the most recent inspection, Duke – Allen appeared to be in compliance with this rule. Continued compliance will be determined during subsequent inspections.

4. *Case-by-Case MACT (CBCM) for Boilers and Process Heaters*

After MACT Subpart DDDDD was initially vacated, North Carolina established a Case-by-Case MACT according to Section 112(j) of the Clean Air Act. The CBCM applies to sources that would have been subject to MACT Subpart DDDDD. The only such source at this facility is the auxiliary boiler ES-6.

In general, the requirements for this rule are 1) operate with good combustion control practices and 2) conduct an annual boiler maintenance inspection of the boiler.

The CBCM shall remain in place for at least 8 years after the re-promulgation date of the MACT. Currently, that date is expected to be May 20, 2019.

During the most recent inspection, Duke – Allen appeared to be in compliance with the CBCM. Continued compliance will be determined during subsequent inspections.

c. *Prevention of Significant Deterioration (PSD)*

This facility is a PSD Major Source, but does not have any BACT limits in the permit. The facility is avoiding a PSD review by complying with several particulate emission limits.

In order to comply with PSD avoidance, this facility must

- 1) Limit PM emissions from boilers 3, 4, and 5;

- 2) Limit PM emissions directly attributable to the use of powdered carbon injection; and
- 3) Limit fugitive dust from flyash disposal by mixing water into the flyash before transporting it.

During the most recent inspection, Duke – Allen appeared to be in compliance with these limits. Continued compliance will be determined during subsequent inspections.

d. Section 112(r) of the Federal Clean Air Act

The facility does not appear to store any 112(r)-subject materials above their respective thresholds. Therefore, the facility does not have any increased requirements under Section 112(r) of the Clean Air Act.

e. Reasonably Available Control Technology (RACT)

This facility is located in Gaston County. Prior to 2016, this area was classified as nonattainment for ozone, and therefore facilities in this county underwent RACT reviews. Gaston County has recently been reclassified and is no longer considered nonattainment. However, as part of the reclassification, all facilities must continue to comply with any existing RACT limits.

The only RACT rule for this facility applies to the auxiliary boiler ES-6, and it is required by 02D .1407. In general, this rule requires the facility to perform an annual tune-up on the boiler.

During the most recent inspection, Duke – Allen appeared to be in compliance with this rule. Continued compliance will be determined during subsequent inspections.

f. Compliance Assurance Monitoring (CAM)

CAM applies to a control device if the following criteria are met:

1. The unit being controlled is subject to a non-exempt emission standard (as defined by 2D .0614(b)(1)),
2. The control device is being used to comply with the emission standard, and
3. The unit being controlled has potential emissions of the pollutant subject to the emission standard of greater than major source thresholds.

The only sources that have potential emissions greater than the major source threshold are the coal-fired boilers. These boilers use control devices to comply with several rules:

Rule	Pollutant	Triggers CAM?	Notes
02D .0501(c)	SO ₂	No	02D .0614(b)(1)(F)
02D .0519	NO _x	No	02D .0614(b)(1)(F)
02D .0536	PM	Yes*	See discussion
02D .1100	TAPs	No	TAPs do not have a major source threshold
02D .1111 (MACT, Subpart UUUUU)	SO ₂ , HAPs	No	02D .0614(b)(1)(A)
02Q .0317	PM	No	02D .0614(b)(1)(E)

Rule	Pollutant	Triggers CAM?	Notes
02Q .0400	NOx, SO2	No	02D .0614(b)(1)(C)

* Only when the facility is not operating a PM CEMS.

Note that this facility operates a CEMS for SO₂, NO_x, and (optionally) PM. CEMS constitutes a continuous compliance determination method (CCDM). The facility has an option to operate either a PM CEMS or a COMS. The COMS does not constitute a CCDM, so CAM applies when the facility is operating a COMS.

The permit includes the approved CAM plan. During the most recent inspection, Duke – Allen appeared to be in compliance with this rule. Continued compliance will be determined during subsequent inspections.

g. Cross State Air Pollution Rule (CSAPR; 40 CFR Part 97, Subparts AAAAA, BBBBB, and CCCCC)

This rule applies to power plants that produce electricity for sale.

CSAPR was originally scheduled to take effect on January 1, 2012. This rule was planned as a replacement for CAIR. However, CSAPR was challenged in court and initially vacated by the DC Circuit Court. Legal issues were finally resolved in April 2014, when the US Supreme Court reversed that decision. Because the regulation was delayed by court proceedings, the effective date of the rule was moved to January 1, 2015.

Under this rule, each of the boilers at the facility is considered a "large electric generating unit", per 40 CFR 52.34. This rule and all requirements thereof are considered Federal-enforceable only. Compliance will be determined by the US EPA, not NC DAQ. A reference to this rule has been added to the permit.

h. Acid Rain Permit (ARP)

This facility has a Title IV Acid Rain Permit that is incorporated into the Title V permit. This requires the facility to obtain allowances for SO₂ emissions, and meet annual NO_x and heat input limits.

Duke – Allen has applied to renew and modify the ARP. Previously, this facility was included in an averaging plan that grouped multiple Duke facilities across multiple states. The modified permit only includes facilities in North Carolina.

In addition to Duke – Allen's proposed changes to the ARP, the permit condition has been rewritten to be clearer and less repetitious.

It should be noted that compliance with the ARP is entirely determined by US EPA.

i. Other SIP Rules

1. 02D .2400 "Clean Air Interstate Rules"

The purpose of this rule was to implement the Federal "Clean Air Interstate Rules" (CAIR), found in 40 CFR Part 52. According to 40 CFR 52.35(f) and 52.36(e), CAIR no longer applies as of January 1, 2015. In response, NCDAQ allowed this SIP rule to expire. Therefore, references to 02D .2400 have been removed from the permit.

2. 02D .2500 "Mercury Rules for Electric Generators"

This rule has expired. Therefore, all references to this rule have been removed from the permit.

3. 02Q .0309 "Termination and Revocation of Permits" and 02Q .0705 "Existing Facilities and SIC Calls"

The rule for 02Q .0705 has been repealed. Therefore, all references to this rule have been removed from the permit. 02Q .0309 was included in the permit as an avoidance condition for 02Q .0705. Given that this rule has been repealed, no avoidance condition is required. Therefore, references to this rule have also been removed from the permit.

j. Consent Decree (Civil Action No. 1:00 cv 1262)

On October 20, 2016, Duke Energy Corporation entered into a consent decree to resolve allegations (while also denying them) that it improperly made modifications at the Duke – Allen facility without properly following the requirements of the PSD provisions of the Clean Air Act.

In general, the consent decree requires that Duke – Allen:

- retire Units 1 and 2 by the end of 2024;
- meet an annual NO_x limit of 0.250 lb/MMBtu from Units 1 and 2;
- meet an annual NO_x limit of 600 tons per year from Units 1 and 2, each; and
- meet an annual SO₂ limit of 0.120 lb/MMBtu from Units 1 and 2.

The Decree provides monitoring and compliance requirements to demonstrate compliance with the above limits, and requires that Duke – Allen submit an application to modify existing permits to reflect the requirements of the Decree.

Duke – Allen submitted the required application on February 25, 2016, and DAQ is processing this under application 3600039.16B. The application is being processed separately from this permit renewal. The Title V permit will not contain a reference to the Decree until this application is processed. Regardless of its inclusion in the Title V permit, Duke – Allen must comply with the requirements of the Decree.

8. Toxic Air Pollutants

This facility has performed air dispersion modeling to demonstrate compliance with the allowable ambient levels (AALs). The permit includes limits for ammonia and sulfur trioxide based on the modeling.

The facility is required to restrict sulfur trioxide use on a per-boiler basis. The permit previously included limits for ammonia injection, but those have been removed because the facility no longer uses ammonia injection.

9. Facility Emissions Review

This permit renewal is not expected to change potential emissions from the facility.

For a historical review of actual emissions from the facility, see the summary table on the first page of this review.

10. Compliance Status

a. Notices of Violation/Recommendation for Enforcement since the previous renewal

April 2, 2013 NOV/NRE issued due to visible emissions exceedances. Duke – Allen was fined a total of \$5,303, which has been paid in full.

b. Inspection status

The facility was most recently inspected Jim Hafner on September 11, 2017. Duke – Allen appeared to be in compliance with the air quality permit at the time of that inspection.

11. Other Regulatory Concerns

A PE seal was not required for this permit renewal.

A zoning consistency form was not required for this permit renewal.

12. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above. South Carolina and Mecklenburg County are affected state/local programs within 50 miles of the facility.

The notice periods began on XXXX and ended on XXXX.

13. Recommendations

TBD

Attachment 1 to review of applications 3600039.14A, .15C, and .16A

Change List

Insert change list from final permit

DRAFT

Attachment 2 to review of applications 3600039.14A, .15C, and .16A

Comments Received on Initial Draft

- Jim Hafner, by email on October 4, 2017

1. Jim pointed out typos in the review.

Response: I have fixed the indicated issues.

2. Jim suggested that the sources I-4 and I-34 are associated with the (now removed) ammonia injection system. Should they be removed?

Response: I forwarded this question to Ann Quillian. In an email on October 30, 2017, she stated that these sources should not be removed from the permit.

3. Jim asked why the recent consent decree was not added to the permit or discussed in the review.

Response: A separate permit application is dealing with this issue. I have now added a discussion of the consent decree to the review.

- Mark Cuilla, by email on October 5, 2017

1. Mark pointed out typos in the permit and review.

Response: I have fixed the indicated issues.

2. Mark asked in MACT Subpart CCCCC should be included in this permit

Response: This rule applies exclusively to area sources. This facility is a major source.

3. Mark asked if the reporting required by Section 2.1 A.2.e. should be quarterly instead of semiannual, given that other similar reports are quarterly.

Response: I agree, and I have made this change.

4. Mark pointed out that DAQ should include the MACT 5D language, regardless of EPA's continued work on that rule. The permit and review should be updated to reflect this.

Response: I have updated the permit to include a condition for MACT 5D and transition language from the CBCM to the MACT. I've corrected the discussion in the review.

- Ann Quillian, by email on October 27, 2017

Ann pointed out several typos in the permit and review.

Response: I have fixed the indicated issues.